

IIRO 001453 to IIRO 001453,	IIRO 002170 to IIRO 002679,
IIRO 001771 to IIRO 001771,	IIRO 002680 to IIRO 002682,
IIRO 001458 to IIRO 001460,	IIRO 002683 to IIRO 002692,
IIRO 001435 to IIRO 001452,	IIRO 002693 to IIRO 002693,
IIRO 001778 to IIRO 001808,	IIRO 002694 to IIRO 002694,
IIRO 001899 to IIRO 001904,	IIRO 002695 to IIRO 002695,
IIRO 001948 to IIRO 001948,	IIRO 002696 to IIRO 002698,
IIRO 001949 to IIRO 001953,	IIRO 002699 to IIRO 002699,
IIRO 001954 to IIRO 001955,	IIRO 002700 to IIRO 002701,
IIRO 001958 to IIRO 001961,	IIRO 002702 to IIRO 002703,
IIRO 001963 to IIRO 001964,	IIRO 002704 to IIRO 002704,
IIRO 001965 to IIRO 001965,	IIRO 002705 to IIRO 002705,
IIRO 001977 to IIRO 001978,	IIRO 002706 to IIRO 002706,
IIRO 001979 to IIRO 002017,	IIRO 002707 to IIRO 002707,
IIRO 002018 to IIRO 002052,	IIRO 002708 to IIRO 002711,
IIRO 002053 to IIRO 002055,	IIRO 002712 to IIRO 002716,
IIRO 002056 to IIRO 002072,	IIRO 004015 to IIRO 004018,
IIRO 002073 to IIRO 002076,	IIRO 004019 to IIRO 004043,
IIRO 002077 to IIRO 002108,	IIRO 004044 to IIRO 004053,
IIRO 002109 to IIRO 002116,	IIRO 004054 to IIRO 004056.
IIRO 002117 to IIRO 002169,	

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 65:

From the period beginning January 1990 through the present, please provide any and all documents relating to the relationship between the IIRO's Saudi headquarters and the IIRO's branch offices worldwide, including but not limited to the IIRO's offices in the United States, United Kingdom, Saudi Arabia, the Philippines, Pakistan, Afghanistan, Sudan, Kenya, Tanzania, Albania, Kosovo, Yugoslavia, and Bosnia-Herzegovina. Such documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 5, 6, 9, 10, and 11.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 000096 to IIRO 000108,	IIRO 001235 to IIRO 001236,
IIRO 000111 to IIRO 000119,	IIRO 001237 to IIRO 001245,
IIRO 000668 to IIRO 000691,	IIRO 001263 to IIRO 001264,
IIRO 000728 to IIRO 000732,	IIRO 001272 to IIRO 001272,
IIRO 000741 to IIRO 000765,	IIRO 001226 to IIRO 0012266,
IIRO 000766 to IIRO 000943,	IIRO 001278 to IIRO 001286,
IIRO 000944 to IIRO 000968,	IIRO 001287 to IIRO 001295,
IIRO 001139,	IIRO 001296 to IIRO 001332,
IIRO 001219 to IIRO 001223,	IIRO 001333 to IIRO 001420,
IIRO 001226 to IIRO 001226,	IIRO 001421 to IIRO 001434,
IIRO 001227 to IIRO 001230,	IIRO 001435 to IIRO 001460,
IIRO 001231 to IIRO 001234,	IIRO 001461 to IIRO 001487,

IIRO 001522 to IIRO 001557,	IIRO 001949 to IIRO 001953,
IIRO 001558 to IIRO 001573,	IIRO 001954 to IIRO 001955,
IIRO 001574 to IIRO 001660,	IIRO 001958 to IIRO 001978,
IIRO 001661 to IIRO 001671,	IIRO 002997 to IIRO 003019,
IIRO 001720 to IIRO 001738,	IIRO 003020 to IIRO 003037,
IIRO 001809 to IIRO 001840,	IIRO 003482 to IIRO 003592,
IIRO 001841 to IIRO 001841,	IIRO 003593 to IIRO 003711,
IIRO 001842 to IIRO 001850,	IIRO 003712 to IIRO 003752,
IIRO 001856 to IIRO 001898,	IIRO 003753 to IIRO 003978,
IIRO 001899 to IIRO 001904,	IIRO 004015 to IIRO 004018,
IIRO 001908 to IIRO 001944,	IIRO 004019 to IIRO 004043,
IIRO 001945 to IIRO 001947,	IIRO 004044 to IIRO 004053,
IIRO 001948 to IIRO 001948,	IIRO 004054 to IIRO 004056.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 66:

From the period beginning January 1990 through the present, please provide any and all documents relating to the relationships between and among the IIRO's branch offices worldwide, including but not limited to the IIRO's offices in the United States, United Kingdom, Saudi Arabia, the Philippines, Pakistan, Afghanistan, Sudan, Kenya, Tanzania, Albania, Kosovo, Yugoslavia, and Bosnia-Herzegovina. Such documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

Defendant restates their response to Production for Documents Request No. 65 as provided herein.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 67:

From the period beginning January 1990 through the present, provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted and followed by the IIRO by which charitable contributions are either made to and/or raised by you, how those contributions are collected and accounted for, how it is determined to which charitable designees financial or other forms of support should be distributed, the means by which financial or other forms of support are subsequently disbursed to charitable designees, and the means to ensure that such distributions are being used for charitable purposes.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 6, 9, 10, and 11.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 000001 to IIRO 000023,	IIRO 000164 to IIRO 000190,
IIRO 000051 to IIRO 000083,	IIRO 000191 to IIRO 000203,
IIRO 000084 to IIRO 000095,	IIRO 000204 to IIRO 000208,
IIRO 000096 to IIRO 000108,	IIRO 000209 to IIRO 000247,
IIRO 000109 to IIRO 000110,	IIRO 000248 to IIRO 000297,
IIRO 000111 to IIRO 000119,	IIRO 000298 to IIRO 000340,
IIRO 000120 to IIRO 000124,	IIRO 000341 to IIRO 000353,
IIRO 000125 to IIRO 000132,	IIRO 000354 to IIRO 000368,
IIRO 000133 to IIRO 000137,	IIRO 000369 to IIRO 000387,
IIRO 000138 to IIRO 000163,	IIRO 000428 to IIRO 000667,

IIRO 000668 to IIRO 000691,	IIRO 001574 to IIRO 001660,
IIRO 000692 to IIRO 000707,	IIRO 001809 to IIRO 001840,
IIRO 000722 to IIRO 000727,	IIRO 001908 to IIRO 001944,
IIRO 000728 to IIRO 000732,	IIRO 001949 to IIRO 001953,
IIRO 000733 to IIRO 000740,	IIRO 003482 to IIRO 003592,
IIRO 000766 to IIRO 000943,	IIRO 003593 to IIRO 003711,
IIRO 000944 to IIRO 000968,	IIRO 003712 to IIRO 003752,
IIRO 000969 to IIRO 000985,	IIRO 003753 to IIRO 003978,
IIRO 001219 to IIRO 001223,	IIRO 004019 to IIRO 004043
IIRO 001226 to IIRO 001277,	IIRO 004044 to IIRO 004053,
IIRO 001278 to IIRO 001286,	IIRO 004054 to IIRO 004056,
IIRO 001296 to IIRO 001332,	IIRO 004057 to IIRO 004069.
IIRO 001522 to IIRO 001557,	

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 68:

From the period beginning January 1990 through the present, please provide any and all documents relating to the involvement of any official, trustee, committee, or board associated with the IIRO's headquarters in Saudi Arabia in determining how funds collected by the IIRO's offices outside of Saudi Arabia should be allocated and/or in the distribution of funds collected by the offices outside of Saudi Arabia.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 5, 6, 9, 10, and 11.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 000001 to IIRO 000023,

IIRO 000051 to IIRO 000083,

IIRO 000084 to IIRO 000095,

IIRO 000096 to IIRO 000108,

IIRO 000109 to IIRO 000110,

IIRO 000111 to IIRO 000119,

IIRO 000120 to IIRO 000124,

IIRO 000125 to IIRO 000132,

IIRO 000133 to IIRO 000137,

IIRO 000138 to IIRO 000163,

IIRO 000164 to IIRO 000190,

IIRO 000191 to IIRO 000203,

IIRO 000204 to IIRO 000208,

IIRO 000209 to IIRO 000247,

IIRO 000248 to IIRO 000297,

IIRO 000298 to IIRO 000340,

IIRO 000341 to IIRO 000353,

IIRO 000354 to IIRO 000368,

IIRO 000369 to IIRO 000387,

IIRO 000428 to IIRO 000667,

IIRO 000668 to IIRO 000691,

IIRO 000692 to IIRO 000707,

IIRO 000722 to IIRO 000727,

IIRO 000728 to IIRO 000732,

IIRO 000733 to IIRO 000740,

IIRO 000766 to IIRO 000943,

IIRO 000944 to IIRO 000968,

IIRO 000969 to IIRO 000985,

IIRO 001140 to IIRO 001225,

IIRO 001226 to IIRO 001277,

IIRO 001278 to IIRO 001286,

IIRO 001287 to IIRO 001295,

IIRO 001296 to IIRO 001332,

IIRO 001333 to IIRO 001420,

IIRO 001421 to IIRO 001434,

IIRO 001435 to IIRO 001460,

IIRO 001461 to IIRO 001487,

IIRO 001522 to IIRO 001557,

IIRO 001558 to IIRO 001573,

IIRO 001574 to IIRO 001660,

IIRO 001661 to IIRO 001671,

IIRO 001720 to IIRO 001738,

IIRO 001778 to IIRO 001808,

IIRO 001809 to IIRO 001840,

IIRO 001841 to IIRO 001841,	IIRO 003482 to IIRO 003592,
IIRO 001842 to IIRO 001855,	IIRO 003593 to IIRO 003711,
IIRO 001856 to IIRO 001898,	IIRO 003712 to IIRO 003752,
IIRO 001899 to IIRO 001904,	IIRO 003753 to IIRO 003978,
IIRO 001908 to IIRO 001944,	IIRO 004019 to IIRO 004043
IIRO 001945 to IIRO 001947,	IIRO 004044 to IIRO 004053,
IIRO 001948 to IIRO 001948,	IIRO 004054 to IIRO 004056,
IIRO 001949 to IIRO 001953,	IIRO 004057 to IIRO 004069.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 69:

From the period beginning January 1990 through September 11, 2001, please provide any and all summaries of contributions received and/or disbursements made by the IIRO.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 6, 9, 10, and 11.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 000001 to IIRO 000023,	IIRO 000111 to IIRO 000119,
IIRO 000051 to IIRO 000083,	IIRO 000120 to IIRO 000124,
IIRO 000084 to IIRO 000095,	IIRO 000125 to IIRO 000132,
IIRO 000096 to IIRO 000108,	IIRO 000133 to IIRO 000137,
IIRO 000109 to IIRO 000110,	IIRO 000138 to IIRO 000163,

IIRO 000164 to IIRO 000190,	IIRO 000969 to IIRO 000985,
IIRO 000191 to IIRO 000203,	IIRO 001296 to IIRO 001332,
IIRO 000204 to IIRO 000208,	IIRO 001333 to IIRO 001420,
IIRO 000209 to IIRO 000247,	IIRO 001421 to IIRO 001434,
IIRO 000248 to IIRO 000297,	IIRO 001435 to IIRO 001460,
IIRO 000298 to IIRO 000340,	IIRO 001661 to IIRO 001671,
IIRO 000341 to IIRO 000353,	IIRO 001842 to IIRO 001855,
IIRO 000354 to IIRO 000368,	IIRO 001861 to IIRO 001888,
IIRO 000369 to IIRO 000387,	IIRO 001908 to IIRO 001944,
IIRO 000428 to IIRO 000667,	IIRO 001948 to IIRO 001948,
IIRO 000668 to IIRO 000691,	IIRO 001958 to IIRO 001978,
IIRO 000692 to IIRO 000707,	IIRO 003482 to IIRO 003592,
IIRO 000722 to IIRO 000727,	IIRO 003593 to IIRO 003711,
IIRO 000728 to IIRO 000732,	IIRO 003712 to IIRO 003752,
IIRO 000733 to IIRO 000740,	IIRO 003753 to IIRO 003978,
IIRO 000741 to IIRO 000765,	IIRO 004019 to IIRO 004043
IIRO 000766 to IIRO 000943,	IIRO 004044 to IIRO 004053,
IIRO 000944 to IIRO 000968,	IIRO 004057 to IIRO 004069.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 70:

From the period beginning January 1990 through the present, please provide any and all information contained in any database maintained by the IIRO, identifying or relating to the sources of funds contributed to the IIRO, and/or the destination of funds distributed by the IIRO.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 5, 6, 9, 10, and 11.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 000001 to IIRO 000023,	IIRO 000354 to IIRO 000368,
IIRO 000051 to IIRO 000083,	IIRO 000369 to IIRO 000387,
IIRO 000084 to IIRO 000095,	IIRO 000428 to IIRO 000667,
IIRO 000096 to IIRO 000108,	IIRO 000668 to IIRO 000691,
IIRO 000109 to IIRO 000110,	IIRO 000692 to IIRO 000707,
IIRO 000111 to IIRO 000119,	IIRO 000722 to IIRO 000727,
IIRO 000120 to IIRO 000124,	IIRO 000728 to IIRO 000732,
IIRO 000125 to IIRO 000132,	IIRO 000733 to IIRO 000740,
IIRO 000133 to IIRO 000137,	IIRO 000766 to IIRO 000943,
IIRO 000138 to IIRO 000163,	IIRO 000944 to IIRO 000968,
IIRO 000164 to IIRO 000190,	IIRO 000969 to IIRO 000985,
IIRO 000191 to IIRO 000203,	IIRO 001140 to IIRO 001225,
IIRO 000204 to IIRO 000208,	IIRO 001226 to IIRO 001277,
IIRO 000209 to IIRO 000247,	IIRO 001278 to IIRO 001286,
IIRO 000248 to IIRO 000297,	IIRO 001287 to IIRO 001295,
IIRO 000298 to IIRO 000340,	IIRO 001296 to IIRO 001332,
IIRO 000341 to IIRO 000353,	IIRO 001333 to IIRO 001420,

IIRO 001421 to IIRO 001434,	IIRO 001899 to IIRO 001904,
IIRO 001435 to IIRO 001460,	IIRO 001908 to IIRO 001944,
IIRO 001461 to IIRO 001487,	IIRO 001945 to IIRO 001947,
IIRO 001522 to IIRO 001557,	IIRO 001948 to IIRO 001948,
IIRO 001558 to IIRO 001573,	IIRO 001949 to IIRO 001953,
IIRO 001574 to IIRO 001660,	IIRO 003482 to IIRO 003592,
IIRO 001661 to IIRO 001671,	IIRO 003593 to IIRO 003711,
IIRO 001720 to IIRO 001738,	IIRO 003712 to IIRO 003752,
IIRO 001778 to IIRO 001808,	IIRO 003753 to IIRO 003978,
IIRO 001809 to IIRO 001840,	IIRO 004019 to IIRO 004043,
IIRO 001841 to IIRO 001841,	IIRO 004044 to IIRO 004053,
IIRO 001842 to IIRO 001855,	IIRO 004057 to IIRO 004069.
IIRO 001856 to IIRO 001898,	

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 71:

From the period beginning January 1990 through the present, please provide all documents relating to any and all relationships the IIRO has with banks or financial institutions located in the United States, United Kingdom, Saudi Arabia, Jordan, the Philippines, Pakistan, Sudan, Kenya, Tanzania, Albania, Kosovo, Yugoslavia, and Bosnia-Herzegovina, including without limitation, all documents relating to the transfer of funds.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 5, 6, 9, 10, 11, and 12.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 000001 to IIRO 000023,	IIRO 000722 to IIRO 000727,
IIRO 000051 to IIRO 000083,	IIRO 000728 to IIRO 000732,
IIRO 000084 to IIRO 000095,	IIRO 000733 to IIRO 000740,
IIRO 000096 to IIRO 000108,	IIRO 000741 to IIRO 000765,
IIRO 000109 to IIRO 000110,	IIRO 000766 to IIRO 000943,
IIRO 000111 to IIRO 000119,	IIRO 000944 to IIRO 000968,
IIRO 000120 to IIRO 000124,	IIRO 000969 to IIRO 000985,
IIRO 000125 to IIRO 000132,	IIRO 001296 to IIRO 001332,
IIRO 000133 to IIRO 000137,	IIRO 001333 to IIRO 001420,
IIRO 000138 to IIRO 000163,	IIRO 001421 to IIRO 001434,
IIRO 000164 to IIRO 000190,	IIRO 001435 to IIRO 001460,
IIRO 000191 to IIRO 000203,	IIRO 001759 to IIRO 001777,
IIRO 000204 to IIRO 000208,	IIRO 002997 to IIRO 003019,
IIRO 000209 to IIRO 000247,	IIRO 003020 to IIRO 003037,
IIRO 000248 to IIRO 000297,	IIRO 003482 to IIRO 003592,
IIRO 000298 to IIRO 000340,	IIRO 003593 to IIRO 003711,
IIRO 000341 to IIRO 000353,	IIRO 003712 to IIRO 003752,
IIRO 000354 to IIRO 000368,	IIRO 003753 to IIRO 003978,
IIRO 000369 to IIRO 000387,	IIRO 004015 to IIRO 004018,
IIRO 000428 to IIRO 000667,	IIRO 004019 to IIRO 004043,
IIRO 000668 to IIRO 000691,	IIRO 004044 to IIRO 004053,
IIRO 000692 to IIRO 000707,	IIRO 004057 to IIRO 004069.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 72:

From the period beginning January 1990 through the present, please provide any and all documents sent to and/or received from shari'a boards of any entity including businesses, banks, mosques, and/or charities.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 5, 6, 9, 10, 11, and 12.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 000001 to IIRO 000023,	IIRO 000209 to IIRO 000247,
IIRO 000051 to IIRO 000083,	IIRO 000248 to IIRO 000297,
IIRO 000084 to IIRO 000095,	IIRO 000298 to IIRO 000340,
IIRO 000096 to IIRO 000108,	IIRO 000341 to IIRO 000353,
IIRO 000109 to IIRO 000110,	IIRO 000354 to IIRO 000368,
IIRO 000111 to IIRO 000119,	IIRO 000369 to IIRO 000387,
IIRO 000120 to IIRO 000124,	IIRO 000428 to IIRO 000667,
IIRO 000125 to IIRO 000132,	IIRO 000668 to IIRO 000691,
IIRO 000133 to IIRO 000137,	IIRO 000692 to IIRO 000707,
IIRO 000138 to IIRO 000163,	IIRO 000722 to IIRO 000727,
IIRO 000164 to IIRO 000190,	IIRO 000728 to IIRO 000732,
IIRO 000191 to IIRO 000203,	IIRO 000733 to IIRO 000740,
IIRO 000204 to IIRO 000208,	IIRO 000741 to IIRO 000765,

IIRO 000766 to IIRO 000943,
IIRO 000944 to IIRO 000968,
IIRO 000969 to IIRO 000985,
IIRO 001015 to IIRO 001138,
IIRO 001296 to IIRO 001332,
IIRO 001333 to IIRO 001420,
IIRO 001421 to IIRO 001434,
IIRO 001435 to IIRO 001460,
IIRO 001488 to IIRO 001521,
IIRO 001672 to IIRO 001719,
IIRO 001759 to IIRO 001777,
IIRO 001979 to IIRO 002017,
IIRO 002018 to IIRO 002052,
IIRO 002053 to IIRO 002055,
IIRO 002056 to IIRO 002072,
IIRO 002073 to IIRO 002076,
IIRO 002077 to IIRO 002108,
IIRO 002109 to IIRO 002116,
IIRO 002117 to IIRO 002169,
IIRO 002170 to IIRO 002679,
IIRO 002680 to IIRO 002682,

IIRO 002683 to IIRO 002692,
IIRO 002693 to IIRO 002693,
IIRO 002694 to IIRO 002694,
IIRO 002695 to IIRO 002695,
IIRO 002696 to IIRO 002698,
IIRO 002699 to IIRO 002699,
IIRO 002700 to IIRO 002701,
IIRO 002702 to IIRO 002703,
IIRO 002704 to IIRO 002704,
IIRO 002705 to IIRO 002705,
IIRO 002706 to IIRO 002706,
IIRO 002707 to IIRO 002707,
IIRO 002708 to IIRO 002711,
IIRO 002712 to IIRO 002716,
IIRO 003482 to IIRO 003592,
IIRO 003593 to IIRO 003711,
IIRO 003712 to IIRO 003752,
IIRO 003753 to IIRO 003978,
IIRO 004019 to IIRO 004043,
IIRO 004044 to IIRO 004053,
IIRO 004057 to IIRO 004069.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 73:

From the period beginning January 1990 through the present, please provide any and all documents sent to and/or received from the Saudi Department of Zakat and Income Tax and the Saudi Arabian Monetary Authority.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 5, 6, 9, 10, 11, and 12. Defendant specifically objects to this request to the extent it seeks information relating to the Kingdom of Saudi Arabia, a sovereign nation not subject to discovery in this case.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant's counsel has not found or learned of any supplemental documents of Defendant's that are responsive to this request.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 74:

From the period beginning January 1990 through the present, please provide any and all documents, statements, interviews, press releases, internal memos or other materials relating to any accusation that the IIRO, or any employee or person associated with the IIRO, was associated with or involved in the sponsorship of any radical, extremist or terrorist activities or organizations.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 5, 6, 9, 10, and 11. Defendant further objects to this request to the extent it seeks documents readily accessible to the plaintiffs from the public domain.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 000766 to IIRO 000968,

IIRO 001797 to IIRO 001798,

IIRO 000984-IIRO 001004,

IIRO 001799 to IIRO 001804,

IIRO 001739 to IIRO 001758,

IIRO 001805 to IIRO 001808,

IIRO 001792 to IIRO 001796,

IIRO 004054 to IIRO 004056.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 75:

From the period beginning January 1990 through the present, please provide any and all documents, statements, interviews, press releases, internal memos or other materials relating to any accusation that the IIRO, or any employee or person associated with the IIRO, was associated with or involved in any criminal or corrupt activities.

ANSWER:

Defendant restates their response to Production for Documents Request No. 74 as provided herein.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 76:

From the period beginning January 1990 through the present, please provide any and all documents, statements, interviews, press releases, internal memos or other materials relating to any accusation that the IIRO, or any employee or person associated with the IIRO, was associated with or involved in any military, radical or terrorist activity, plot or attack.

ANSWER:

Defendant restates their responses to Production for Documents Requests No. 74 and 75 as provided herein.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 77:

From the period beginning January 1990 through the present, please provide any and all documents sent to, and/or received from any third party relating to the alleged involvement of the IIRO, or any employee or person associated with the IIRO, in any

criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant restates their responses to Production for Documents Requests No. 74, 75, and 76 as provided herein.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 78:

From the period beginning January 1990 through the present, please provide any and all documents relating to the alleged involvement of any Islamic charity or charities in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant restates their responses to Production for Documents Requests No. 74, 75, 76, and 77 as provided herein.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 79:

From the period beginning January 1990 through the present, please provide any and all documents in your possession or control relating in any way to IIRO meetings, correspondence, statements, or other communications concerning terrorist financing.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 5, 6, 9, 10, and 11. Defendant further objects to this request to the extent it seeks documents readily accessible to the plaintiffs from the public domain.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 001296 to IIRO 001332,

IIRO 001778 to IIRO 001808,

IIRO 001739 to IIRO 001758,

IIRO 004054 to IIRO 004056.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 80:

From the period beginning January 1990 through the present, please provide any and all documents relating to any internal investigation by the IIRO into any alleged criminal, corrupt, or extremist activities of any employee or person associated with the IIRO, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 5, 6, 9, 10, and 11. Defendant further objects to this request to the extent it seeks documents readily accessible to the plaintiffs from the public domain.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 001140 to IIRO 001225,

IIRO 001792 to IIRO 001796,

IIRO 001226 to IIRO 001277,

IIRO 001797 to IIRO 001798,

IIRO 001296 to IIRO 001332,

IIRO 001799 to IIRO 001804,

IIRO 001461 to IIRO 001487,

IIRO 001805 to IIRO 001808,

IIRO 001574 to IIRO 001660,

IIRO 004054 to IIRO 004056.

IIRO 001739 to IIRO 001758,

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 81:

From the period beginning January 1990 through the present, please provide any and all documents sent to, and/or received from the MWL, relating to any accusation that the IIRO, or any employee or person associated with the IIRO, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 5, 6, 9, 10, 11, and 12. Defendant further objects to this request to the extent it seeks documents readily accessible to the plaintiffs from the public domain.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 001185 to IIRO 001185,	IIRO 001551 to IIRO 001551,
IIRO 001191 to IIRO 001214,	IIRO 001557 to IIRO 001557,
IIRO 001226 to IIRO 001229,	IIRO 001620 to IIRO 001653,
IIRO 001481 to IIRO 001482,	IIRO 001792 to IIRO 001796.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 82:

From the period beginning January 1990 through the present, please provide any and all documents sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that the IIRO, or any employee or person associated with the IIRO, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 6, 9, 10, 11, and 12. Defendant specifically objects to this request to the extent it seeks information relating to the Kingdom of Saudi Arabia, a sovereign nation not subject to discovery in this case.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant's counsel has not found or learned of any supplemental documents of Defendant's that are responsive to this request.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 83:

From the period beginning January 1990 through the present, please provide any and all documents sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that any Islamic charity or charities, or employee or person associated with any Islamic charity or charities, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 6, 9, 10, 11, and 12. Defendant specifically objects to this request to the extent it seeks information relating to the Kingdom of Saudi Arabia, a sovereign nation not subject to discovery in this case.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant's counsel has not found or learned of any supplemental documents of Defendant's that are responsive to this request.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 84:

Provide all documents relating to investigations or inquiries conducted by the United States Government or any United States-based regulatory body, bank, financial institution, accountant, or auditor ("United States Investigator"), or any foreign government or any foreign-based regulatory body, bank, financial institution, accountant,

or auditor ("Foreign Investigator"), into financial transactions linked to accounts held solely or jointly by you.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 3, 4, 6, 9, 10, 11, and 12.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 000766 to IIRO 000948,

IIRO 000984 to IIRO 001004,

IIRO 000969 to IIRO 000985,

IIRO 004054 to IIRO 004056,

IIRO 004057 to IIRO 004069.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 85:

Provide all documents relating to the Republic of Kenya's investigation and subsequent determination to ban the IIRO in September 1998 following the bombings of the U.S. Embassies in Kenya and Tanzania.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 6, 9, 10, 11, and 12.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant's counsel has not found or learned of any supplemental documents of Defendant's that are responsive to this request.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 86:

Provide all documents relating to any investigations conducted by the Republic of the Philippines and its subsequent determination that the IIRO office in the Philippines was used to finance terrorist organizations, including but not limited to, Al Qaida, Abu Sayyaf, and the Moro Islamic Liberation Front ("MILF").

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 6, 9, 10, 11, and 12.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 000984 to IIRO 001004, IIRO 003020 to IIRO 003037,

IIRO 002997 to IIRO 003019, IIRO 004054 to IIRO 004056

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 87:

Provide all documents relating to any investigations conducted by the Islamic Republic of Pakistan and its subsequent determination to expel IIRO personnel after September 11, 2001.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 6, 9, 10, 11, and 12. Defendant specifically objects to this Request as not calculated to lead to discoverable evidence as it is merely a baseless rumor. To that effect, subject to and without waiving the above objections, Defendant directs Plaintiffs to the following documents which support Defendant's objection:

IIRO 01139, IIRO 001488 to IIRO 001493.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

IIRO

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REQUEST 88:

Provide all copies of any and all documents and things that have been seized by, or produced by the IIRO to, any investigators, auditors, and/or government agencies concerning the IIRO's alleged support for, or connections to, alleged terrorist organizations, groups, individuals, or activities.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 6, 9, 10, 11, and 12. Defendant further objects to the extent that this request seeks information from any governments of subject to any foreign immunity or privileges they may assert.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 000766 to IIRO 000968.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 89:

From the period beginning January 1990 through the present, please provide any and all documents relating to any action taken by the IIRO to prevent criminal activities, including the sponsorship of terrorist or radicals, by persons employed by, or affiliated with the IIRO or any of its branch offices.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 6, 9, 10, and 11.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 000001 to IIRO 000023,
IIRO 000051 to IIRO 000083,
IIRO 000084 to IIRO 000095,
IIRO 000096 to IIRO 000108,
IIRO 000109 to IIRO 000110,
IIRO 000111 to IIRO 000119,
IIRO 000120 to IIRO 000124,
IIRO 000125 to IIRO 000132,
IIRO 000133 to IIRO 000137,
IIRO 000138 to IIRO 000163,
IIRO 000164 to IIRO 000190,
IIRO 000191 to IIRO 000203,
IIRO 000204 to IIRO 000208,
IIRO 000209 to IIRO 000247,
IIRO 000248 to IIRO 000297,
IIRO 000298 to IIRO 000340,
IIRO 000341 to IIRO 000353,
IIRO 000354 to IIRO 000368,
IIRO 000369 to IIRO 000387,
IIRO 000428 to IIRO 000667,
IIRO 000668 to IIRO 000691,
IIRO 000692 to IIRO 000707,

IIRO 000722 to IIRO 000727,
IIRO 000728 to IIRO 000732,
IIRO 000733 to IIRO 000740,
IIRO 000741 to IIRO 000765,
IIRO 000766 to IIRO 000943,
IIRO 000944 to IIRO 000968,
IIRO 000969 to IIRO 000985,
IIRO 001015 to IIRO 001138,
IIRO 001140 to IIRO 001225,
IIRO 001226 to IIRO 001277,
IIRO 001278 to IIRO 001286,
IIRO 001287 to IIRO 001295,
IIRO 001296 to IIRO 001332,
IIRO 001333 to IIRO 001420,
IIRO 001421 to IIRO 001434,
IIRO 001435 to IIRO 001460,
IIRO 001461 to IIRO 001487,
IIRO 001488 to IIRO 001521,
IIRO 001522 to IIRO 001557,
IIRO 001558 to IIRO 001573,
IIRO 001574 to IIRO 001660,
IIRO 001661 to IIRO 001671,

IIRO 001672 to IIRO 001719,
IIRO 001720 to IIRO 001738,
IIRO 001739 to IIRO 001758,
IIRO 001778 to IIRO 001808,
IIRO 001809 to IIRO 001840,
IIRO 001841 to IIRO 001841,
IIRO 001842 to IIRO 001855,
IIRO 001856 to IIRO 001898,
IIRO 001899 to IIRO 001904,
IIRO 001908 to IIRO 001944,
IIRO 001948 to IIRO 001948,
IIRO 001949 to IIRO 001953,
IIRO 001956 to IIRO 001957,
IIRO 001958 to IIRO 001978,
IIRO 001979 to IIRO 002017,
IIRO 002018 to IIRO 002052,
IIRO 002053 to IIRO 002055,
IIRO 002056 to IIRO 002072,
IIRO 002073 to IIRO 002076,
IIRO 002077 to IIRO 002108,
IIRO 002109 to IIRO 002116,
IIRO 002117 to IIRO 002169,
IIRO 002170 to IIRO 002679,

IIRO 002680 to IIRO 002682,
IIRO 002683 to IIRO 002692,
IIRO 002693 to IIRO 002693,
IIRO 002694 to IIRO 002694,
IIRO 002695 to IIRO 002695,
IIRO 002696 to IIRO 002698,
IIRO 002699 to IIRO 002699,
IIRO 002700 to IIRO 002701,
IIRO 002702 to IIRO 002703,
IIRO 002704 to IIRO 002704,
IIRO 002705 to IIRO 002705,
IIRO 002706 to IIRO 002706,
IIRO 002707 to IIRO 002707,
IIRO 002708 to IIRO 002711,
IIRO 002712 to IIRO 002716,
IIRO 003482 to IIRO 003592,
IIRO 003593 to IIRO 003711,
IIRO 003712 to IIRO 003752,
IIRO 003753 to IIRO 003978,
IIRO 004054 to IIRO 004056.
IIRO 004019 to IIRO 004043,
IIRO 004057 to IIRO 004069.

REQUEST 90:

From the period beginning January 1990 through the present, please provide any and all documents relating to any action undertaken by the IIRO to remove or purge radical or corrupt elements or individuals from the IIRO's branch offices.

ANSWER:

Defendant restates their response to Production for Documents Request No. 89 as provided herein.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 91:

Provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any IIRO subsidiary, affiliate, branch office, officer, director, trustee, board member, committee member, manager, agent, employee, and/or representative as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 6, 9, 10, and 11.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 001219 to IIRO 001223,

IIRO 001461 to IIRO 001487,

IIRO 001226 to IIRO 001277,

IIRO 001574 to IIRO 001660,

IIRO 001287 to IIRO 001295,

IIRO 001739 to IIRO 001758,

IIRO 001333 to IIRO 001420,

IIRO 001778 to IIRO 001808,

IIRO 001421 to IIRO 001434,

IIRO 001949 to IIRO 001953,

IIRO 001435 to IIRO 001460,

IIRO 001954 to IIRO 001955.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 92:

Provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any individual, including but not limited to, any of the persons identified in Exhibit A, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 5, 6, 9, 10, 11, and 12.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 001227 to IIRO 001230,	IIRO 001743 to IIRO 001744,
IIRO 001253 to IIRO 001255,	IIRO 001751 to IIRO 001751,
IIRO 001256 to IIRO 001258,	IIRO 001753 to IIRO 001756,
IIRO 001296 to IIRO 001332,	IIRO 001778 to IIRO 001808,
IIRO 001421 to IIRO 001434,	IIRO 004054 to IIRO 004056.
IIRO 001435 to IIRO 001460,	

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 93:

Provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any Islamic charity, benevolent association, IIRO supporter, donor, supplier, contributor, facilitator, speakers, foreign government supporters, business supporters, or banks, including but not limited to, any of the entities identified in Exhibit B, as a result of financial irregularities, suspicious activities,

investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 5, 6, 9, 10, 11, and 12.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 001227 to IIRO 001230,	IIRO 001461 to IIRO 001487,
IIRO 001253 to IIRO 001255,	IIRO 001605 to IIRO 001611,
IIRO 001256 to IIRO 001258,	IIRO 001739 to IIRO 001758,
IIRO 001296 to IIRO 001332,	IIRO 001778 to IIRO 001808,
IIRO 001421 to IIRO 001434,	IIRO 001861 to IIRO 001888,
IIRO 001435 to IIRO 001460,	IIRO 001899 to IIRO 001904.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 94:

Provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted by the IIRO concerning the acceptance and distribution of monetary donations, which are currently being used or were used to prevent or deter financial crimes such as money laundering or the facilitation of terrorism financing.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 4, 5, 6, 9, 10, and 11.

Further, due to the immense burden of producing all potentially responsive documents in the Southern District of New York, defendant will make its overseas

offices, its warehouse in Jeddah, Saudi Arabia, and the IIRO-SA corporate headquarters available for inspection.

Subject to, and without waiving the above objections, Defendant directs Plaintiffs to the following documents:

IIRO 000001 to IIRO 000023,	IIRO 000668 to IIRO 000691,
IIRO 000051 to IIRO 000083,	IIRO 000692 to IIRO 000707,
IIRO 000084 to IIRO 000095,	IIRO 000722 to IIRO 000727,
IIRO 000096 to IIRO 000108,	IIRO 000728 to IIRO 000732,
IIRO 000109 to IIRO 000110,	IIRO 000733 to IIRO 000740,
IIRO 000111 to IIRO 000119,	IIRO 000741 to IIRO 000765,
IIRO 000120 to IIRO 000124,	IIRO 000766 to IIRO 000943,
IIRO 000125 to IIRO 000132,	IIRO 000944 to IIRO 000968,
IIRO 000133 to IIRO 000137,	IIRO 000969 to IIRO 000985,
IIRO 000138 to IIRO 000163,	IIRO 001007 to IIRO 001014,
IIRO 000164 to IIRO 000190,	IIRO 001015 to IIRO 001138,
IIRO 000191 to IIRO 000203,	IIRO 001139
IIRO 000204 to IIRO 000208,	IIRO 001140 to IIRO 001225,
IIRO 000209 to IIRO 000247,	IIRO 001226 to IIRO 001277,
IIRO 000248 to IIRO 000297,	IIRO 001278 to IIRO 001286,
IIRO 000298 to IIRO 000340,	IIRO 001296 to IIRO 001332,
IIRO 000341 to IIRO 000353,	IIRO 001333 to IIRO 001420,
IIRO 000354 to IIRO 000368,	IIRO 001421 to IIRO 001434,
IIRO 000369 to IIRO 000387,	IIRO 001435 to IIRO 001460,
IIRO 000428 to IIRO 000667,	IIRO 001461 to IIRO 001487,

IIRO 001488 to IIRO 001521,
IIRO 001522 to IIRO 001557,
IIRO 001558 to IIRO 001573,
IIRO 001661 to IIRO 001671,
IIRO 001672 to IIRO 001719,
IIRO 001720 to IIRO 001738,
IIRO 001739 to IIRO 001758,
IIRO 001809 to IIRO 001840,
IIRO 001841 to IIRO 001841,
IIRO 001842 to IIRO 001855,
IIRO 001856 to IIRO 001898,
IIRO 001905 to IIRO 001907,
IIRO 001908 to IIRO 001944,
IIRO 001948 to IIRO 001948,
IIRO 001949 to IIRO 001953,
IIRO 001956 to IIRO 001957,
IIRO 001958 to IIRO 001978,
IIRO 001979 to IIRO 002017,
IIRO 002018 to IIRO 002052,
IIRO 002053 to IIRO 002055,
IIRO 002056 to IIRO 002072,
IIRO 002073 to IIRO 002076,
IIRO 002077 to IIRO 002108,

IIRO 002109 to IIRO 002116,
IIRO 002117 to IIRO 002169,
IIRO 002170 to IIRO 002679,
IIRO 002680 to IIRO 002682,
IIRO 002683 to IIRO 002692,
IIRO 002693 to IIRO 002693,
IIRO 002694 to IIRO 002694,
IIRO 002695 to IIRO 002695,
IIRO 002696 to IIRO 002698,
IIRO 002699 to IIRO 002699,
IIRO 002700 to IIRO 002701,
IIRO 002702 to IIRO 002703,
IIRO 002704 to IIRO 002704,
IIRO 002705 to IIRO 002705,
IIRO 002706 to IIRO 002706,
IIRO 002707 to IIRO 002707,
IIRO 002708 to IIRO 002711,
IIRO 002712 to IIRO 002716,
IIRO 003482 to IIRO 003592,
IIRO 003593 to IIRO 003711,
IIRO 003712 to IIRO 003752,
IIRO 003753 to IIRO 003978,
IIRO 004019 to IIRO 004043,

IIRO 004044 to IIRO 004053,

IIRO 004057 to IIRO 004069

IIRO 004054 to IIRO 004056,

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 95:

Provide copies of any and all laws, statutes, regulations, ordinances, or royal decrees which would have prohibited any Islamic charity or benevolent association from: (i) engaging in conduct unrelated to their ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) providing material support or resources to al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 3, 4, 5, 6, 9, 10, 11, and 12. Defendant also specifically objects to this request as exclusively seeking documents which are equally accessible to the Plaintiffs because they are readily obtainable independently from the public domain.

Inasmuch as discovery is ongoing, Defendant reserves the right to supplement and/or revise this Answer.

REQUEST 96:

Provide all documents relating to any and all information or notification you received prior to September 11, 2001, that any subsidiary, affiliate, or branch office of the IIRO, including any officer, director, trustee, board member, committee member, manager, agent, employee, or representative of the IIRO, may have been or was engaging in conduct unrelated to the IIRO's ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

Defendant incorporates and asserts each of the General Objections identified above, specifically including General Objections 1, 2, 3, 4, 5, 6, 9, 10, and 11. Defendant